



U.S. Department of Justice
Civil Division

March 28, 2025

By ECF

Honorable Michael E. Farbiarz
United States District Judge
U.S. Post Office & Courthouse
Federal Square
Newark, New Jersey 07101

Re: ***Khalil v. Joyce, et al.*, Civ. Act. No. 25-1963 (MEF) (MAH)**
Consent Request to Extend Briefing Schedule

Dear Judge Farbiarz:

We represent the Respondents (“the Government”) in the above-referenced petition for writ of habeas corpus. With the consent of Petitioner’s counsel, the Government respectfully requests that this Court extend the briefing deadlines currently in effect for Petitioner’s Motion for a Preliminary Injunction (ECF Nos. 66, 124). Specifically, the Government asks the Court to extend the deadline for the Government to file an opposition to the Motion for a Preliminary Injunction from Monday, March 31, 2025, at 5 p.m. to Wednesday, April 2, 2025, at 10:00 a.m. The Government also asks the Court to grant a corresponding extension of the deadline for Petitioner’s reply, from Friday, April 4, 2025, at 5 p.m. to Sunday, April 6, 2025, at 10:00 a.m.

Good cause exists for the requested extensions. The Office of Immigration Litigation experienced a widespread IT issue that left some team members. The undersigned was unable to log into the computer system until the late evening on March 27. In addition, since the Government agreed to the current briefing schedule, the parties appeared before the Court on the morning of Friday, March 28, 2025. The Government’s attorneys had to travel from Washington, D.C. to New Jersey for the hearing. These instances delayed the Government’s ability to continue its work on its brief in opposition.

Therefore, the Government respectfully requests that the Court extend the deadline for the Government’s opposition to Wednesday, April 2, 2025, at 10:00 a.m. and the deadline for Petitioner’s reply to Sunday, April 6, 2025, at 10:00 a.m.

We thank the Court for its attention to this matter.

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Respectfully submitted,

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